

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
JOANN INC., <i>et al.</i> , ¹	Case No. 25-10068 (CTG)
Debtors.	(Jointly Administered)
	Obj. Deadline: March 28, 2025 @ 4:00 pm (ET) Hearing Date: April 3, 2025 @ 1:00 pm (ET)

**NOTICE OF MOTION OF CI WARNER ROBBINS, LLC TO COMPEL IMMEDIATE
PAYMENT OF STUB RENT AND POST-PETITION RENT AND
OBLIGATIONS PURSUANT TO 11 U.S.C. §§ 365(d)(3) AND 503(b)(1)(A)**

PLEASE TAKE NOTICE that on March 14, 2025, CI Warner Robbins, LLC (the “Movant”) filed the *Motion of CI Warner Robbins, LLC to Compel Immediate Payment of Stub Rent and Post-Petition Rent and Obligations Pursuant to 11 U.S.C. §§ 365(d)(3) and 503(b)(1)(A)* (“Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court and filed with the Court, so as to be received on or before **March 28, 2025, at 4:00 p.m. (Eastern Time)** (“Objection Deadline”). At the same time, you must also serve a copy of the response upon undersigned counsel.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **April 3, 2025 at 1:00 p.m. (Eastern Time)**, before the Honorable Craig T. Goldblatt in the Bankruptcy Court, 824 North Market Street, 3rd Floor, Courtroom #7, Wilmington, Delaware 19801.

IF YOU DO NOT TAKE THESE STEPS BY THE OBJECTION DEADLINE, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY GRANT THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: March 14, 2025
Wilmington, Delaware

GELLERT SEITZ BUSENKELL & BROWN, LLC

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